

**DEPARTMENT OF AGING**

1300 NATIONAL DRIVE  
SACRAMENTO, CA 95834  
Internet Home Page: [www.aging.ca.gov](http://www.aging.ca.gov)  
TDD Only 1-800-735-2929  
FAX Only (916) 928-2509  
(916) 419-7555



January 21, 2009

Jo Johnson, Director  
Fresno-Madera Area Agency on Aging  
3845 N. Clark Street, Suite 103  
Fresno, CA 93726

Dear Ms. Johnson:

Enclosed is a report issued by the California Department of Aging (CDA), which summarizes the monitoring visit of the Fresno-Madera Area Agency on Aging (FMAAA), serving Planning and Service Area (PSA 14). CDA staff conducted the visit on November 3-6, 2008. The purpose of the visit was to review the Administrative, Fiscal, and Program components of your direct and contracted Title III/VII, Title III E, Title V, and Community-Based Services Programs (CBSP).

The format of the report contains five specific sections that include: Recap/Overview of Monitoring Visit, Best Practices/Models of Service Delivery, Technical Assistance, Findings Requiring Corrective Action, and a Corrective Action Plan (CAP).

For your convenience, the required actions to be taken by the FMAAA to correct specific findings associated with the monitoring visit are summarized into a CAP format. A copy of the CAP will be sent to you via email to allow you to complete the plan electronically. When completing the CAP, detail in Column F the action you will take to resolve the findings specified in Column C. Any documentation you submit to verify compliance with a required action should be detailed in Column E.

Please provide a response to the findings within 30 days from the date of this letter using the CAP format provided. Submit the CAP electronically to Eura Trent at [etrent@aging.ca.gov](mailto:etrent@aging.ca.gov). If the FMAAA needs to submit documents to verify compliance, please submit a hard copy of the CAP along with the additional documentation.

We would like to thank you, your staff, the Governing Board Chair, and the Advisory Council Chair for all the assistance and hospitality during our visit. For your convenience we have enclosed two copies of this report. Please provide a copy to your Governing Board Chair and your Advisory Council Chair.

CDA will conduct a comprehensive assessment of your agency again in 2012. In the meantime, please do not hesitate to contact us should you or your staff have questions regarding the administration of programs funded through the Older Americans Act or Older Californians Act.

Sincerely,

Geri Baucom, Coach  
Monitoring Protocol Team

Enclosures

cc: Patty Manfredi, Chair, Governing Board

Vonnie Franks, Chair, Advisory Council

Lynn Daucher, Director  
California Department of Aging

Edward P. Long, Deputy Director  
Long-Term Care and Aging Services Division

**FRESNO-MADERA AREA AGENCY ON AGING  
PSA 14**

**REPORT OF THE  
MONITORING VISIT**

**Conducted by the  
California Department of Aging  
November 3-6, 2008**

**CONTENTS**

- ▶ **Recap/Overview of Monitoring Visit**
- ▶ **Best Practices or Models of Service Delivery**
- ▶ **Technical Assistance**
- ▶ **Findings Requiring Corrective Action**
- ▶ **Corrective Action Plan**

The onsite assessment of the Fresno-Madera Area Agency on Aging (FMAAA) was conducted by staff of the California Department of Aging from November 3-6, 2008. Staff present were Geri Baucom, Coach, Monitoring and Fiscal; and Program Specialists, Tasha Wilson (Administrative and Disaster Preparedness); Maria Olmos (Fiscal); Kathleen Hendrickson (Title III B Supportive Services, Title III B Information and Assistance, Linkages, and Alzheimer's Day Care Resource Center); and Cecilia Perez Dunn and Phil Carr (Title V Senior Community Service Employment Program). CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA).

This report includes:

- Recap of the standards monitored during the visit.
- Recognition of best practices or models of service delivery discovered during the monitoring visit that will be shared with the aging network by posting a notice on CDA's website.
- Documentation of the technical assistance on specific program standards provided to the FMAAA during the monitoring visit.
- Findings and required actions to be taken by the FMAAA to correct specific findings associated with the monitoring visit.
- Corrective Action Plan to be completed by FMAAA and submitted to CDA.

Throughout the report, we use either FMAAA or AAA to refer to the Fresno-Madera Area Agency on Aging. In every instance, the two terms are synonymous.

## **RECAP/OVERVIEW OF MONITORING VISIT**

This section provides a recap of the standards monitored during the visit and the recognition of the FMAAA staff that assisted CDA accomplish its work.

### **AAA Administrative Review**

#### **Governing Board**

Geri Baucom and Tasha Wilson met with Patty Manfredi, Governing Board Chair, Al Grace, 1<sup>st</sup> Vice Chair, Jo Johnson, AAA Director, and Jean Robinson, Assistant Director to determine if the Governing Board, as the policy-making body of the AAA, recognizes and fulfills its roles and responsibilities as required by all regulations, laws, and contracts. FMAAA is governed by a joint powers agreement between the City of Fresno, Fresno County, and Madera County. The Board of Directors consists of 15 members, with 5 members appointed from each entity. The Executive Committee meets monthly (except for July, August, and November) and attends Advisory Council meetings. The Board works closely with the FMAAA staff and continues to support senior programs in Planning and Service Area (PSA) 14 as evidenced by the Sierra Resource Campus.

#### **Advisory Council**

Geri Baucom and Tasha Wilson met with Vonnie Franks, Advisory Council Chair, Leonard Haggerty, Former Chair, and Jean Robinson, Assistant Director to determine if the Advisory Council is provided the opportunity to (1) advise the AAA on all matters related to the development and administration of the Area Plan and all operations conducted under the plan, and (2) further the AAA's mission of developing a community-based system of care for older persons living within the PSA. Since the last monitoring visit conducted in August 2004, the Advisory Council has expanded its involvement in the Needs Assessment process, Area Plan Development, and program expansion. Advisory Council members surveyed participants at congregate meal sites as part of an ongoing effort to increase participation. Area Plan Public Hearings are held during Advisory Council meetings and members have a role in reviewing and achieving the goals and objectives. Working with RSVP, the Advisory Council created a flyer to promote the "Not So Purrfect Angels" project which places animals with seniors.

#### **Staffing and Organization**

Tasha Wilson met with Carole Gonzales, Assistant Director, to determine if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. Ms. Wilson reviewed duty statements, a desk manual, and the Personnel Procedures manual and determined that personnel practices and procedures have been established and are well maintained. Training is encouraged for all employees. Staff attend mandatory training but also have the opportunity to take career development classes and attend work related conferences such as C4A. In addition, the most recent organizational chart was compared to the Area Plan and Title V budgets to determine if the positions identified on the budgets submitted to CDA match the AAA's organizational structure.

### Procurement/Contract Process

Geri Baucom met with Carole Gonzales, Assistant Director, and Linda Descoteaux, Administrative Planner, to determine if the AAA has established systematic procedures for the award and administration of contracts in the Area Plan and to ensure FMAAA awarded contracts through an open and competitive process. A review of the AAA's procurement process found the most recent Request for Proposal (RFP) contained most required components. There were no appeals, grievances, or lawsuits filed as a result of the RFP and all contracts reviewed were executed in a timely manner.

### Area Plan Achievement

Tasha Wilson met with Linda Descoteaux, Administrative Planner, and Jean Robinson, Assistant Director, to determine if FMAAA has a process in place for monitoring and tracking the progress of goals and objectives in the current approved Area Plan. Fiscal, program, and data staff work collaboratively to develop the Area Plan. Ms. Descoteaux uses the "tasks function" of her outlook calendar to track established timelines and due dates for current objectives and is in constant communication with the Director, Program Managers, and the Advisory Council to monitor progress on goals. A skeleton Area Plan is used throughout the year to note progress; therefore, when an Area Plan Update is required, the information is readily available.

### Targeting/Needs Assessment

Tasha Wilson met with Linda Descoteaux, Administrative Planner, to ensure the FMAAA conducts a needs assessment once every four years and targets older individuals with the greatest economic or social needs with particular attention to low-income, minority individuals who live within the PSA. In February 2005, FMAAA conducted a series of Focus Groups to discuss necessary preparation for serving the Baby Boomers. Input from a broad range of perspectives has provided FMAAA with a strong foundation for evaluating how services will be adapted to meet the needs of the Baby Boomers. In March 2007, FMAAA surveyed visitors to congregate meal sites, in hopes of finding information that would help increase participation. Over a 13 month period, FMAAA Advisory Council members surveyed 455 seniors at 16 meal sites. Through use of the Info Van, FMAAA promotes services to targeted populations in pocket rural areas and immigrant camps; and provides information to large businesses. FMAAA staff participate in health fairs, serve as panel speakers at conferences, and highlight services on the local Comcast show "Senior Scape."

### Management of Service Providers

Geri Baucom met with Carole Gonzales, Assistant Director, and Linda Descoteaux, Administrative Planner, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The AAA disseminates information to service providers by phone, mail, and through regular email communication. CDA Program Memos are sent to service providers; technical assistance and training are provided as needed. Ms. Baucom also reviewed the monitoring schedule and service provider files and found AAA staff conducted annual monitoring. Monitoring reports included findings, recommendations, and timelines for corrective actions.

### Data Reporting

Tasha Wilson met with Linda Descoteaux, Administrative Planner, to verify that data collection and reporting processes are in place at all levels to ensure timely submission of complete, accurate, and verifiable data. FMAAA uses “Q” Care Access for reporting and submits timely and accurate reports to CDA on a consistent basis. Ms. Descoteaux has an efficient process in place for verifying data reports prior to submission to CDA. In addition, FMAAA provides training and technical support to service providers on data collection and reporting requirements during Service Provider meetings and one-on-one as needed.

### AAA Fiscal Review

Maria Olmos met with Carole Gonzales, Assistant Director and Bonnie Audas, Accountant, to discuss the financial reporting system of the AAA. Each standard of the AAA Fiscal Review tool was covered. Several reported expenditures were traced back to originating invoices and supporting documents; and service provider contract language was reviewed for fiscal requirements. The AAA processes checks internally after appropriate AAA staff review and approve invoices. AAA staff use Quickbooks and Excel spreadsheets to track expenditures (monthly and year-to-date), funding sources, and to complete monthly reports to CDA.

### Specific Program Reports—Older Americans Act Programs

#### **Title III B—Supportive Services (General)**

FMAAA contracts for the following Title III B Supportive Services: Homemaker, Chore, Adult Day Care, Transportation, Outreach, Security/Crime and Community Services/Senior Center Management. In addition, FMAAA provides Title III B Outreach as a direct service.

Kathleen Hendrickson reviewed Title III B Outreach and Adult Day Services. Outreach Services are provided by the Information & Assistance (I & A) staff of the AAA. FMAAA contracts with the Valley Caregiver Resource Center for Adult Day Services. Ms. Hendrickson reviewed the Adult Day Services contract, RFP, and monitoring.

Ms. Hendrickson met with Sandi Martin, Direct Services Manager and Cory Scholtes, Direct Services Supervisor concerning the Outreach program. Two I & A staff are responsible for participating in local events representing the AAA. The staff also take the AAA Info Van to events and local areas and meet one-on-one with potential clients and their caregivers.

Kathleen Hendrickson also met with Sandi Martin, Cory Scholtes, and Detective Dave Case, Fresno County Sheriff’s Department to discuss the Elder Abuse Education program the AAA funds through Title III B Security/Crime. Detective Case is a former Fresno police officer who now works for the Fresno County Sheriff’s Department providing Elder Abuse education to first responders such as firemen, law enforcement, and emergency medical technicians in the PSA’s service area. Detective Case also coordinates with I & A staff to make presentations.

Detective Case is located in the Sierra Resource Campus building with Adult Protective Services, In-Home Supportive Services, and the other senior services. This co-location allows for coordination of services to clients. Detective Case and Mr. Scholtes also co-author a website ([www.scamnot.org](http://www.scamnot.org)) which provides information about elder abuse and sends scam alerts by email to interested parties.

### **Title III B—Information and Assistance (I&A)**

FMAAA provides I & A as a direct service. There are three I & A staff members who are located in the Direct Services building and provide services to Fresno and Madera counties. The staff use the Info Van to provide services in both counties.

Kathleen Hendrickson met with Sandi Martin, Direct Services Manager and Cory Scholtes, Direct Services Supervisor to review the Information and Assistance Program Tool. I & A staff attempt follow-up with 100 percent of the callers requesting assistance. AAA staff provided Ms. Hendrickson with several documents associated with the I & A program, including the “Senior Information & Assistance Program Training and Procedure Manual”. This manual contains all the information the I & A staff need to provide services. One highlight of the manual is the “Guidelines for Effective Communication” section that provides the staff with techniques on how to work with difficult people, how to listen to the caller and listening with your “third ear” (listen to how something is said and listening for what is said and not said).

Recently I & A staff were given a second computer monitor so that they can enter information about the caller into the system and also have an additional screen open to the resource directory. The entire resource directory is available on-line. I & A staff also have a 300-page hardbound copy of the directory. Because the directory is too large to print for the public, the AAA hands out a postcard (in English and Spanish) directing interested parties to call the 800 number or the AAA’s local I & A number.

During the visit, Ms. Hendrickson called the 1-800-510-2020 line during and after hours. After hours, the caller was advised to call back, leave a message, or call 9-1-1 in case of emergency. During working hours the caller was advised that I & A staff were not available but the caller could leave their name and number and someone would call back within the hour. Ms. Hendrickson also checked the local telephone book for the 1-800 number and found it listed under Multi-service Agencies, Fresno/Madera Area Agency on Aging.

### **Title V—Senior Community Services Employment Program (SCSEP)**

Cecilia Perez Dunn and Phil Carr met with Carl McHenry, SCSEP Supervisor, and Sandi Martin, Direct Services Manager. The FMAAA provides SCSEP services directly and administers 30 authorized positions. The assessment consisted of a review of the CDA SCSEP monitoring tool, participant files, management tools, and the data collection system. In addition, Ms. Dunn and Mr. Carr interviewed two SCSEP participants and one host agency supervisor. Both participants and the host agency supervisor were pleased with the services received.



Participant files were reviewed and are well-documented. Mr. McHenry maintains excellent case management through tools he developed which document the participants' skill development progress, along with case notes and tracking forms which outline training progress and timelines. The FMAAA SCSEP exceeded 80% of the combined performance goals in FY 2007/08 and is in good standing.

### **Specific Program Reports—Older Californians Act Programs**

#### **Alzheimer's Day Care Resource Center (ADCRC)**

The Alzheimer's Day Care Resource Center program is provided by Older Adult Social Services (OASIS) in conjunction with the Valley Caregiver Resource Center (VCRC). OASIS is licensed by the California Department of Social Services, Community Care Licensing.

OASIS operates two Adult Day programs on the AAA campus, OASIS I and II. OASIS I has a core group of approximately 25 participants. OASIS II recently opened and the staff indicated they are conducting outreach in the community to increase the daily attendance. The two sites share resources and in an emergency are able to share staff. OASIS also provides ADCRC services in Madera County at the Madera Adult Day Care Center.

Kathleen Hendrickson, Jean Robinson, Assistant Director, and Linda Descoteaux, AAA Planner, visited OASIS I and II. Jill Schneider, OASIS Director, and Margery Minney, VCRC Executive Director conducted the tour. Both sites have an inviting, warm atmosphere, with friendly staff. It is evident that the construction of OASIS II was conducted in a thoughtful manner keeping in mind the needs of the participants.

Ms. Hendrickson reviewed the contract, RFP, and monitoring for this program. Although the Core Elements Tool was not used, the AAA did use the Core Elements Tool questions as part of their monitoring.

#### **Linkages**

The Linkages Program is a direct service of the AAA. Staff are located in the Direct Services building on the Sierra Resource Campus. The program has two care managers who have caseloads of approximately 50 clients each.

Prior to the monitoring visit, Kathleen Hendrickson reviewed the Linkages Self-Assessment Tool completed by FMAAA staff. During the visit Ms. Hendrickson met with Frances Contreras, Clinical Manager and Jean Robinson, Assistant Director. Ms. Hendrickson reviewed two client charts, one per care manager. Each chart indicated the care managers provided comprehensive, thorough care management services to their clients. The charts were easy to read and included detailed assessments and reassessments. Progress notes and the Contact Summary clearly outlined the services provided, contact with the client, and follow up to ensure the client was satisfied with the arranged or purchased services. Ms. Contreras and her care managers are commended for the outstanding services they provide to their clients.

## **BEST PRACTICES/MODELS OF SERVICE DELIVERY**

Best practices or models of service delivery discovered during the monitoring of Area Agencies on Aging are being identified by the Department to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either Best Practices or models of service delivery identified during the monitoring visit conducted by the Department and discussed at the Exit Conference. We will place on CDA's website, those best practices or models of service delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services.

### **Title III B—Supportive Services (General)**

#### **Elder Abuse Education**

The AAA contracts with the Fresno County Sheriff's Department to provide an officer to educate first responders and the community about Elder Abuse.

### **Disaster Preparation**

#### **Disaster Preparedness Plan**

FMAAA has done an excellent, thorough job on Disaster Preparedness from the ground up. Disaster Preparedness is identified as a priority and addressed through goals and objectives in the AAA's Area Plan. All AAA staff members have duffel bag emergency kits that contain typical emergency supplies and have been personalized to include medication and other personal necessities. Contract language requires all service providers to have a disaster preparedness plan. Advisory Council members provide PowerPoint presentations throughout the counties. "File of Life" inserts have been modified to include a physician's initials next to current medications, so the list can be used as a prescription in case of emergency. FMAAA also continues to advocate for the specific needs of seniors and adults with disabilities through involvement with government agencies and community organizations and a strong relationship with the Office of Emergency Services. FMAAA's entire Disaster Preparedness effort should be used as a model for other AAAs throughout the State.

### **Title V—Senior Community Service Employment Program (SCSEP)**

#### **Participant Tracking Form and Case Summary Sheet of Data Validation Requirements**

To maintain up-to-date case management practices regarding the assessment and monitoring of participants' skill development, participants' progress, and data validation requirements, the SCSEP Supervisor developed an array of program management tools. These tools include: various skills inventory tools, a program notes and tracking form, and a summary sheet of data validation requirements to document data validation requirements.

These tools provide a summary of each participant's skill development progress for both the participant and supervisor, and assurance that the data validation elements are satisfied.

## **Linkages**

### Contact Summary form

The Linkages Program staff developed a Contact Summary form used to electronically record the care managers' contact with their clients by telephone or in person. Progress notes are used to record contact with vendors, service providers, etc. to arrange or purchase services. The division of activities to separate forms allows the reader to follow the client's progress and delivery of service.

### Authorization to Release Information form

The Linkages Program staff request clients sign release forms to allow care managers to speak with family members and friends. This practice provides the client with the option of choosing who will provide information to the care manager and could help the care manager avoid complicated family dynamics.

### TCM Fee Waiver

The Application and Informed Consent form clients sign, to participate in care management services, includes a section for the client to sign when they are unable to pay for care management services.

## TECHNICAL ASSISTANCE

One purpose of the monitoring visit is for CDA staff to provide technical assistance to AAA staff on specific program standards that did not rise to the level of a finding that would require formal corrective action. Detailed below is specific technical assistance provided by the program team during the monitoring visit.

### **Area Plan Achievement**

While reviewing the Area Plan Goals and Objectives, CDA staff found some of the Goals funded as Coordination activities did not meet that definition. The following definitions for Program Development and Coordination were discussed with AAA staff:

Program Development: activities that either establish a new service or expand or integrate existing services.

Coordination: activities that involve the active participation of the AAA staff to include liaison with non-OAA funded agencies and organizations for the purpose of avoiding duplication, improving services, resolving problems related to service delivery, and addressing the service needs of the eligible service population.

### **AAA Fiscal Review**

Ms. Audas requested Technical Assistance on the AAA's Excel system used to track expenditures and request for funds submitted to CDA. Ms. Olmos observed that Ms. Audas did not adjust the Excel file when CDA staff adjusted the reports submitted by the AAA. Ms. Olmos informed Ms. Audas that these files should be reconciled regularly to reflect the figures on the final CDA approved monthly reports returned to the AAA.

### **Title III B—Supportive Services (General)**

During the review of Title III B Outreach, AAA staff discussed their one-on-one contacts and their involvement in community activities where they provide information to groups of people attending the events. Because Outreach units of service only include one-on-one activities, CDA staff informed AAA staff they have the option of funding a new Title III B Supportive Services category "Public Information". Public Information activities include "contact with multiple current or potential clients or caregivers through publications, publicity campaigns, and other mass media campaigns including Internet websites". Information concerning this category can be found in Program Memo 08-15.

### **Title V—Senior Community Service Employment Program (SCSEP)**

CDA and AAA staff discussed the eligibility determination process and the formal orientation process which is provided at enrollment. CDA staff reminded AAA staff of the separate processes for document verification and the orientation since orientation is a paid SCSEP activity. A copy of records must always be obtained prior to the orientation of eligible individuals.

**Alzheimer's Day Care Resource Center (ADCRC)**

During a review of the contract and RFP, it was found that the RFP did not contain language indicating that the ADCRC program must be provided in a licensed facility. CDA staff recommended that the language from the contract (which stipulates the requirement for a license) be added to the RFP.

**Linkages**

While reviewing the Contract Summary on a chart, CDA staff found conflicting information about the client's current health status. Care Managers should review their electronic entries on this form to ensure they do not contain conflicting information.

The Linkages Assessment/Reassessment form in the Linkages Manual contains a psychological assessment section. Sites have been instructed they do not have to use the forms in the Manual; however, any forms used must contain all of the elements of the tools in the manual. The FMAAA Linkages staff use the Geriatric Depression Scale as their psychological assessment. While reviewing the chart of a younger disabled client, CDA staff observed that the Geriatric Depression Scale had not been used for this client. Although the Geriatric Depression Scale is not part of the Assessment/Reassessment form in the Manual, it is an acceptable substitution. If the Linkages Program staff continue to use the Geriatric Depression Scale, it must be used on all clients during the Assessment/Reassessment process.

## **FINDINGS REQUIRING CORRECTIVE ACTION**

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on November 6, 2008. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

### **Administrative Review**

#### **Advisory Council**

California Code of Regulations (CCR) Section 7302(a)(12)(D) states in part that the composition of the Advisory Council should represent the percentage of the Planning and Service Area's (PSA) older population and race and ethnicity for each of the following categories:

1. White
2. Hispanic
3. Black
4. Asian/Pacific Islander
5. Native American/Alaskan Native
6. Other

The PSA's 60+ population includes 20.8% Hispanic individuals and 3.7% Black individuals, while only 13.3% of the Advisory Council members are Hispanic and none of the Advisory Council members are Black. This leaves the Council with reduced representation on issues that impact Hispanic and Black individuals.

**Corrective Action:** Recruit Advisory Council members that represent the ethnic composition of the community with particular emphasis on recruiting members representing the Hispanic and Black communities.

#### **Procurement/Contract Process**

CCR Section 7364(a)(5) states in part that any information pursuant to 42 U.S.C. 3026 must be included in agreements with service providers, such as the identity of each focal point. FMAAA's current contract language does not contain this required language.

**Corrective Action:** Ensure service provider contracts include the identity of each designated community focal point.

#### **Staffing and Organization**

CCR Section 7318(h)(1) requires AAAs to submit budgets that include a schedule of paid personnel costs by position title and funding category. To verify accuracy of this information, CDA staff reviewed the AAA's current organizational chart that details

each employee's name, title, and percent of full-time equivalent assigned to each position. The current AAA organizational chart did not agree with the personnel pages of the Area Plan Budget.

**Corrective Action:** Ensure the organizational chart agrees with the personnel pages of the Area Plan budget and the Title V budget.

**Corrective Action:** Ensure staff classifications on the organizational chart agree with the personnel pages of the Area Plan budget and the Title V budget.

### **Management of Service Providers**

Section 315(b)(4)(A) and (B) of the OAA states AAAs must ensure that each service provider provide each recipient with an opportunity to voluntarily contribute to the cost of the service but clearly inform each recipient there is no obligation to contribute and the contribution is purely voluntary. CDA staff reviewed monitoring tools and discovered that FMAAA's program monitoring tools do not include questions regarding how the service providers solicit voluntary contributions or inform recipients that services will not be denied if they are unable to contribute to the cost of the service.

**Corrective Action:** Expand onsite program monitoring to include verification that voluntary contribution procedures meet all CDA requirements.

### **AAA Fiscal Review**

#### **Financial Reporting**

Ms. Audas normally prepares the Title V monthly report based on an enrollee hourly summary report prepared by the Title V Supervisor, Carl McHenry. For the September reporting period, Ms. Audas used a report extracted from Quickbooks, a fairly new system implemented by the AAA. In either process, the data obtained is not reconciled routinely to the actual hours recorded on approved Title V enrollee timesheets. When Ms. Olmos attempted to track September's reported expenditures back to originating documentation, the amounts did not agree. Per 45 Code of Federal Regulations (CFR) 92.20(b)(1), AAAs are required to establish and maintain a financial reporting system that reflects accurate disclosure of financial activities of the AAA.

**Corrective Action:** Reconcile monthly Title V reported expenditures with Title V participant timesheets.

#### **Budget Control**

Ms. Olmos reviewed employee timesheets and discovered Carl McHenry, Title V Supervisor, is documenting time as a direct employee of the AAA. However, Mr. McHenry's time was budgeted as an indirect cost in the Title V Budget submitted to

CDA. OMB Circular A-87 Section (C)(f) requires allowable costs be accorded consistent treatment. A cost may not be budgeted as an indirect cost if the same cost is documented as a direct cost.

**Corrective Action:** Budget the Title V Supervisor as a direct administrative cost in the Title V budget.